

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

**ELEANOR McCULLEN, JEAN
BLACKBURN ZARRELLA,
GREGORY A. SMITH, CARMEL
FARRELL, and ERIC CADIN,**

Plaintiffs,

v.

**MARTHA COAKLEY, Attorney
General for the COMMONWEALTH OF
MASSACHUSETTS,**

Defendant.

Civil Action No._____

MOTION TO ADMIT KEVIN H. THERIOT PRO HAC VICE

Philip D. Moran, a member in good standing of the Bar of this Court, hereby moves for the admission of Kevin H. Theriot to participate in the conduct of the trial of this action and related pre-trial and post-trial proceedings on behalf of Plaintiffs. In support of this motion, Mr. Theriot states as follows:

1. I am a licensed attorney with seventeen (17) years experience in federal civil rights and First Amendment litigation. My business address is Alliance Defense Fund; 15192 Rosewood; Leawood, Kansas 66224. My telephone number is (913) 685-8000. My email address is ktheriot@telladf.com.

2. I am an active member in good standing of the State Bars of Florida (Bar # 0136761), Georgia (Bar # 373095), Kansas (Bar # 21565), Missouri (Bar # 55733), Tennessee (Bar # 015049), Texas (Bar # 00788908), and Virginia (Bar # 38324). I am admitted to practice, and in good standing, in the United States District Courts for the District of

Colorado, Middle District of Florida, Northern and Middle Districts of Georgia, District of Kansas, Eastern District of Michigan, Western District of Missouri, Western District of Oklahoma, Middle District of Tennessee, and Eastern and Western Districts of Texas, as well as the United States Courts of Appeal for the Fifth, Sixth, Eighth, Ninth, Tenth, and Eleventh Circuits, and the United States Supreme Court.

3. I have never been subject to professional disciplinary proceedings, or criminal charges, of any kind, and my name does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. There are no disciplinary proceedings currently pending against me.

4. I will familiarize myself with and comply with the standards of professional conduct required of members of the Massachusetts State Bar and the local rules of this Court.

5. Attached hereto is a true and correct copy of a Certificate of Good Standing from the United States District Court for the District of Kansas, dated January 11, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

/s/Kevin H. Theriot
Kevin H. Theriot

WHEREFORE, movant hereby moves the court to admit Kevin H. Theriot *pro hac vice* to appear on behalf of Plaintiffs in this action.

CERTIFICATION OF COMPLIANCE

Pursuant to Local Rule 7.1(a)(2), the undersigned hereby certifies that on Monday, December 31, 2007, counsel for Plaintiffs conferred with Kenneth W. Salinger, Esq., Administrative Law Division, Office of the Attorney General, Commonwealth of Massachusetts, who stated that the Commonwealth does not oppose this motion.

Respectfully submitted,

/s/ Philip D. Moran

Philip D. Moran, MA Bar # 353920

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